

# ECO-STAT LLC

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March 5, 2015

Philip W. Horton, Esq.  
Arnold & Porter LLP  
555 Twelfth Street, NW  
Washington, DC 20004-1206

**Re: Sokolow v. PA/PLO**  
**Our Case No.: 5131118**

Dear Mr. Horton:

Per your request, I have calculated the prejudgment interest in connection with the verdict rendered in the above-referenced matter on February 23, 2015, as listed in the Plaintiffs' Corrected Proposed Final Judgment.

Prejudgment interest was calculated for each plaintiff from the date of the injury/death ("incident") to the time of this written report. Accrued interest was calculated compounded annually<sup>1</sup> at the average annual prime rate from the date of the incident to the time of this written report. I also calculated the interest per day that will be accrued post the date of my report through the entry of judgment<sup>2</sup> at the present annual prime rate of 3.25%.

Annual prime rates from the date of the incident to the date of this written report were obtained from the Board of Governors of the Federal Reserve System website, under the Historical Data

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<sup>1</sup> Compounded Annual Interest = Verdict *multiplied* (1 *plus* Average Annual Prime Rate)<sup>to the power of</sup> time in years between date of incident to date of this report *minus* Verdict.

<sup>2</sup> Assuming judgment will be entered in 2015.

Selected Interest Rates, Bank Prime Loan Rates ([www.federalreserve.gov/releases/h15/data.htm](http://www.federalreserve.gov/releases/h15/data.htm)).  
Average annual prime rates used for each plaintiff are indicated in the attached table.

In the enclosed table, I listed for each plaintiff: the compensatory damages verdict, the accrued prejudgment interest, and the total verdict plus prejudgment interest. I also calculated the treble damages and the total damages. Daily accrued interest, post the date of this written report, is also shown in the attached table.

Very truly yours,

ECO-STAT, LLC

*Michael Soudry*

Michael Soudry, M.B.A.

Enclosure

**Prejudgment Interest Compounded Annually at the Average Prime Rate  
from the Date of Incident through March 5, 2015**

	<b>Verdict</b>	<b>Accrued Interest</b>	<b>Verdict and Interest</b>	<b>Treble Damages</b>	<b>Total</b>	<b>Accrued Daily Interest</b>
<b>A. Sokolow Family - Date of Incident 1/27/02; Average Prime Rate of 4.591%</b>						
Mark Sokolow	\$5,000,000	\$4,004,719	\$9,004,719	\$18,009,438	\$27,014,156	\$802
Rena Sokolow	7,500,000	6,007,078	13,507,078	27,014,156	40,521,235	1,203
Jamie Sokolow	6,500,000	5,206,134	11,706,134	23,412,269	35,118,403	1,042
Lauren Sokolow	5,000,000	4,004,719	9,004,719	18,009,438	27,014,156	802
Elana Sokolow	2,500,000	2,002,359	4,502,359	9,004,719	13,507,078	401
<b>B. Gould/Rine Family - Date of Incident 1/22/02; Average Prime rate of 4.591%</b>						
Shayna Eileen Gould	\$20,000,000	\$16,041,030	\$36,041,030	\$72,082,060	\$108,123,090	\$3,209
Ronald Allan Gould	3,000,000	2,406,154	5,406,154	10,812,309	16,218,463	481
Elise Janet Gould	3,000,000	2,406,154	5,406,154	10,812,309	16,218,463	481
Jessica Rine	3,000,000	2,406,154	5,406,154	10,812,309	16,218,463	481
<b>C. Waldman Family - Date of Incident 1/22/02; Average Prime Rate of 4.591%</b>						
Shmuel Waldman	\$7,500,000	\$6,015,386	\$13,515,386	\$27,030,772	\$40,546,159	\$1,203
Henna Novack Waldman	2,500,000	2,005,129	4,505,129	9,010,257	13,515,386	401
Morris Waldman	2,500,000	2,005,129	4,505,129	9,010,257	13,515,386	401
<b>D. Bauer Family - Date of incident 3/21/02; Average Prime Rate of 4.589%</b>						
Alan J. Bauer	\$7,000,000	\$5,518,780	\$12,518,780	\$25,037,559	\$37,556,339	\$1,115
Yehonathon Bauer	25,000,000	19,709,927	44,709,927	89,419,855	134,129,782	3,981
Binyamin Bauer	1,000,000	788,397	1,788,397	3,576,794	5,365,191	159
Daniel Bauer	1,000,000	788,397	1,788,397	3,576,794	5,365,191	159
Yehuda Bauer	1,000,000	788,397	1,788,397	3,576,794	5,365,191	159
<b>E. Mandelkorn Family - Date of Incident 6/19/02; Average Prime Rate of 4.586%</b>						
Leonard Mandelkorn	\$10,000,000	\$7,682,386	\$17,682,386	\$35,364,773	\$53,047,159	\$1,574
<b>F. Coulter Family - Date of Incident 7/31/02; Average Prime Rate of 4.585%</b>						
Robert L. Coulter Sr.	\$7,500,000	\$5,692,221	\$13,192,221	\$26,384,443	\$39,576,664	\$1,175
Estate of Janis Coulter	2,500,000	1,897,407	4,397,407	8,794,814	13,192,221	392
Dianne Coulter Miller	3,000,000	2,276,889	5,276,889	10,553,777	15,830,666	470
Robert L. Coulter Jr.	3,000,000	2,276,889	5,276,889	10,553,777	15,830,666	470
<b>G. Carter Family - Date of Incident 7/31/02; Average Prime Rate of 4.585%</b>						
Larry Carter	\$6,500,000	\$4,933,258	\$11,433,258	\$22,866,517	\$34,299,775	\$1,018
Estate of Diane Carter	1,000,000	758,963	1,758,963	3,517,926	5,276,889	157
Shaun Choffel	1,500,000	1,138,444	2,638,444	5,276,889	7,915,333	235
<b>H. Blutstein Family - Date of incident 7/31/02; Average Prime Rate of 4.585%</b>						
Richard Blutstein	\$6,000,000	\$4,553,777	\$10,553,777	\$21,107,554	\$31,661,331	\$940
Estate of Benjamin Blutstein	2,500,000	1,897,407	4,397,407	8,794,814	13,192,221	392
Katherine Baker	6,000,000	4,553,777	10,553,777	21,107,554	31,661,331	940
Rebekah Blutstein	4,000,000	3,035,851	7,035,851	14,071,703	21,107,554	626
<b>I. Gritz Family - Date of Incident 7/31/02; Average Prime Rate of 4.585%</b>						
Nevenka Gritz	\$10,000,000	\$7,589,628	\$17,589,628	\$35,179,257	\$52,768,885	\$1,566
Estate of David Gritz	2,500,000	1,897,407	4,397,407	8,794,814	13,192,221	392
Estate of Norman Gritz	2,500,000	1,897,407	4,397,407	8,794,814	13,192,221	392

	Verdict	Accrued Interest	Verdict and Interest	Treble Damages	Total	Accrued Daily Interest
<b>J. Goldberg Family - Date of Incident 1/29/04; Average Prime Rate of 4.631%</b>						
Karen Goldberg	\$13,000,000	\$8,487,777	\$21,487,777	\$42,975,553	\$64,463,330	\$1,913
Chana Bracha Goldberg	8,000,000	5,223,247	13,223,247	26,446,494	39,669,742	1,177
Esther Zahava Goldberg	8,000,000	5,223,247	13,223,247	26,446,494	39,669,742	1,177
Yitzhak Shalom Goldberg	6,000,000	3,917,435	9,917,435	19,834,871	29,752,306	883
Shoshana Malka Goldberg	4,000,000	2,611,624	6,611,624	13,223,247	19,834,871	589
Eliezer Simcha Goldberg	4,000,000	2,611,624	6,611,624	13,223,247	19,834,871	589
Yaakov Moshe Goldberg	2,000,000	1,305,812	3,305,812	6,611,624	9,917,435	294
Tzvi Yehoshua Goldberg	2,000,000	1,305,812	3,305,812	6,611,624	9,917,435	294
<b>Total:</b>	<b>\$218,500,000</b>	<b>\$164,872,335</b>	<b>\$383,372,335</b>	<b>\$766,744,669</b>	<b>\$1,150,117,004</b>	<b>\$34,136</b>